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CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

MATTHEW WHITE,

Defendant.

NO. **CR19-253 RSL**

INFORMATION

The United States Attorney charges that:

COUNT 1
(Wire Fraud)

A. The Scheme and Artifice to Defraud

1. Beginning in 2011, and continuing until about August 2018, in Skagit County, within the Western District of Washington, and elsewhere, MATTHEW WHITE did knowingly devise and intend to devise a scheme and artifice to defraud and to obtain money by means of material false and fraudulent pretenses, representations, and promises and concealment of material facts, as set forth below.

2. The essence of the scheme to defraud was to secure investor funds by claiming investment expertise and success he did not possess, then conceal the true

1 use of investor funds by sending false account statements to his victims. WHITE
2 received well over a million dollars from family and other acquaintances to invest on
3 their behalf, then pooled their money in his personal bank and trading accounts. Though
4 he sent investors monthly statements purporting to show regular trading activity and
5 steady profits, WHITE actually made very few trades, earned no net profits, and used
6 customer money for his own personal expenses.

7 **B. Manner and Means of the Scheme and Artifice to Defraud**

8 3. It was part of the scheme and artifice to defraud that, between 2011 and
9 2018, WHITE solicited and received approximately \$1.29 million from victim investors
10 in Florida and Washington for the purpose of trading commodity futures contracts, first
11 under his own name and later under the company name M.W. Global Futures LLC
12 (“MWGF”). At all relevant times, WHITE was the sole officer or employee of MWGF.

13 4. It was further part of the scheme and artifice to defraud that, to secure
14 investor funds, WHITE held himself out to be a skilled commodities trader and
15 distributed promotional materials that advertised his training and qualifications. For
16 example, he touted himself to potential investors as “a full time Commodities Trader
17 specializing in trading the U.S. Treasury Bonds” and claimed to have “received formal
18 professional training from a proprietary trading firm based in Chicago, IL.” He also
19 claimed to be a member of the Chicago Board of Trade. None of these claims was true.

20 5. It was further part of the scheme and artifice to defraud that those
21 promotional materials also falsely claimed that MWGF provided a high return on
22 investment when compared to other investment options, stating, “On average, M.W.
23 Global Futures LLC makes roughly 10% more annually than an investment in a common
24 fund and is on par with the S&P 500.”

25 6. It was further part of the scheme and artifice to defraud that, once in
26 possession of investors’ funds, WHITE would send investors monthly statements
27 purporting to show the trading activity undertaken on their behalf and the resulting gain
28 or loss for each trading day, as well as a summary of the beginning and ending monthly

1 balance and overall monthly profit. These statements, sent either through the U.S. mail
2 or by electronic mail, falsely represented that WHITE engaged in trading every month,
3 his trading was profitable, and investors were earning positive returns on their
4 investments.

5 7. It was further part of the scheme and artifice to defraud that, in monthly
6 statements for months in which WHITE did trade, he significantly inflated the amount of
7 profits earned. The false account statements, which led victims to believe that their
8 investments were earning substantial profits, induced victims to deposit additional funds
9 with WHITE and MWGF.

10 8. It was further part of the scheme and artifice to defraud that these fabricated
11 monthly statements did not reflect WHITE's actual trading activity, which was far less
12 active and far less profitable than he represented on the statements. WHITE's true
13 brokerage account showed that he made small, infrequent trades, and instead transferred
14 at least a portion of the funds provided by the victims for investment to his own personal
15 bank account to use for daily living expenses.

16 **C. Execution of the Scheme and Artifice to Defraud**

17 9. On or about the date set forth below, in Skagit County, within the Western
18 District of Washington, and elsewhere, MATTHEW WHITE, having devised the above-
19 described scheme and artifice to defraud, for the purpose of executing this scheme and
20 artifice, did knowingly transmit and cause to be transmitted by wire communication in
21 interstate and foreign commerce the below-listed representative writings, signs, signals,
22 pictures, and sounds:

Count	Date	Wire Transmission
1	September 1, 2016	Email attaching fabricated monthly trading statement sent from MATTHEW WHITE in Florida to C.C. in Washington State

27 All in violation of Title 18, United States Code, Section 1343.

ASSET FORFEITURE ALLEGATION

The allegations contained in Count 1 of this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture. Upon conviction of the offense contained in Count 1, the Defendant MATTHEW WHITE shall forfeit, to the United States, all property constituting or traceable to proceeds of the offense. All such property is forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), by way of Title 28, United States Code, Section 2461(c), and includes but is not limited to a sum of money reflecting the proceeds the Defendant obtained from the offense.

Substitute Assets. If any of the above-described forfeitable property, as a result of any act or omission of the Defendant,

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with a third party;
3. has been placed beyond the jurisdiction of the Court;
4. has been substantially diminished in value; or,
5. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek the forfeiture of any other property of the Defendant up to the value of the

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1 above-described forfeitable property.
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3 DATED: December 9, 2019
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6 BRIAN T. MORAN

United States Attorney
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9 ANDREW C. FRIEDMAN

10 Assistant United States Attorney

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12 BENJAMIN T. DIGGS

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